

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

BILLY JONES,

Plaintiff,

vs.

No. 13 -00741 RB-WPL

**ESPANOLA MUNICIPAL SCHOOL DISTRICT,
and SUPERINTENDENT JANETTE ARCHULETA**

Defendants.

**DEFENDANT ESPANOLA MUNICIPAL SCHOOL DISTRICT'S ANSWERS TO
PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS**

COMES NOW Defendant Espanola Municipal School District, by and through its counsel of record, Narvaez Law Firm, P.A. (Henry F. Narvaez and Carlos E. Sedillo), for its *Answers to Plaintiff's First Requests for Admission* states.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1

Admit that in September of 2010, neither you nor your employees had any evidence that Billy Jones escaped from a hospital.

ADMIT _____

DENY X _____

On the night of September 10, 2010, Plaintiff called his girlfriend, the daughter of then Assistant Principal Ruben Salazar asking her to be picked up from the hospital and Mr. Salazar was informed about this phone conversation and became concerned. The following day, Principal Arthur Salazar heard reports that he Plaintiff had escaped from the hospital.

REQUEST FOR ADMISSION NO. 5

Admit that Billy Jones did not write “hit list” on any drawing which was seized from him in September of 2010.

ADMIT X

DENY

REQUEST FOR ADMISSION NO. 6

Admit that Billy Jones did not publish any alleged “hit list” during class with his teacher Josephina Litera.

ADMIT

DENY X

Some of the students in his classroom, informed their teacher Ms. Litera that Plaintiff had a list with their names on it depicting gory illustrations of their death and she reported this to administration.

REQUEST FOR ADMISSION NO. 8

Admit that no student saw the alleged “hit list”.

ADMIT

DENY X

Some of the students in his classroom, informed their teacher Ms. Litera that Plaintiff had a list with their names on it depicting gory illustrations of their death and she reported this to administration.

REQUEST FOR ADMISSION NO. 9

Admit that no student saw Billy Jones’s drawings.

ADMIT

DENY X

Some of the students in his classroom, informed their teacher Ms. Litera that Plaintiff had a list with their names on it depicting gory illustrations of their death and she reported this to administration.

REQUEST FOR ADMISSION NO. 10

Admit that Billy Jones never admitted he created a “hit list”.

ADMIT _____

DENY X

When Plaintiff was called into Principal Ortega’s office, he admitted that the hit list was his and that he prepared it.

REQUEST FOR ADMISSION NO. 11

Admit that Dr. Fidel Trujillo has no personal knowledge regarding the events at issue in Plaintiff’s complaint that took place on September 7, 2010.

ADMIT X

DENY _____

Dr. Trujillo was briefed of the incident prior to serving as the hearing officer, but was not involved in the investigation itself.

Respectfully submitted,

NARVAEZ LAW FIRM, P.A.

/s/ Carlos E. Sedillo

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